

**STATEMENT OF BASIS**

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0056227; AI 9340; PER20090001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

**I. THE APPLICANT IS:**

St. Mary Parish Government  
Harold J Babe Landry Landfill  
5<sup>th</sup> Floor-Courthouse  
Franklin, LA 70538

**II. PREPARED BY:**

Rachel Davis

**DATE PREPARED:**

December 9, 2009

**III. PERMIT ACTION:**

reissue LPDES permit LA0056227, AI 9340; PER20090001

LPDES application received: November 24, 2008

EPA has not retained enforcement authority.

LPDES permit issued: June 1, 2004

LPDES permit expired: May 31, 2009

**IV. FACILITY INFORMATION:**

A. The application is for the discharge of treated leachate, treated sanitary wastewater, treated contact stormwater, treated equipment washwater and non-contact stormwater runoff from a municipal solid waste landfill serving St. Mary Parish, lower St. Martin Parish, and a small population of Iberia and Terrebonne Parish.

B. The facility is located on 752 Thorguson Drive in Berwick, St. Mary Parish.

C. Leachate and contaminated stormwater are treated by stabilization in an oxidation pond. Sanitary wastewater and equipment washwater are treated by an extended aeration sewage treatment plant with disinfection by chlorination.

**D. Outfall 001**

Discharge Location: Latitude 29° 40' 28" North  
Longitude 91° 14' 37" West

Description: Stabilized leachate from landfill

Expected Flow: 0.0288 MGD

Type of Flow Measurement which the facility is currently using:  
Estimation based on calculations

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Outfall 002

Discharge Location: Latitude 29° 40' 53" North  
Longitude 91° 14' 05" West

Description: Treated sanitary wastewater

Expected Flow: 0.001 MGD

Type of Flow Measurement which the facility is currently using  
Estimation based on calculations

Outfall 004

Discharge Location: Latitude 29° 40' 48" North  
Longitude 91° 14' 45" West

Description: non-contact stormwater

Expected Flow: 11.7 MGD (24 hour, 25 year rain event)

Type of Flow Measurement which the facility is currently using  
Estimation based on rainfall

**V. RECEIVING WATERS:**

Outfall 001 discharges into Berwick Drainage Canal. Outfall 002 discharges into a ditch, thence into Berwick Drainage Canal. Outfall 004 discharges into Simmons Bayou, thence into Berwick Drainage Canal. All Outfalls are in segment 010701 of the Atchafalaya River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The **critical low flow** (7Q10), for the purpose of limit calculations, is 4.9 cfs based on a report from Todd Franklin dated March 16, 2009.

The **hardness value** is 134 mg/l and the **fifteenth percentile value for TSS** is 28.3 mg/l based on a report from Todd Franklin dated March 16, 2009.

The designated uses and degree of support for Segment 010701 of the Atchafalaya River Basin are as indicated in the table below<sup>1/</sup>:

Degree of Support of Each Use						
Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Full	Full	Not Supported	N/A	N/A	N/A	N/A

<sup>1/</sup>The designated uses and degree of support for Segment 010701 of the Atchafalaya River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

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**VI. ENDANGERED SPECIES:**

The receiving waterbody, Subsegment 010701 of the Atchafalaya River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 23, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

**VII. HISTORIC SITES:**

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

**VIII. PUBLIC NOTICE:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Rachel Davis  
Water Permits Division  
Department of Environmental Quality  
Office of Environmental Services  
P. O. Box 4313  
Baton Rouge, Louisiana 70821-4313

**IX. PROPOSED PERMIT LIMITS:****Final Effluent Limits:**

Subsegment 010701, Bayou Teche-Berwick to Wax Lake Outlet, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

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## OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Daily Max.	Basis
BOD <sub>5</sub>	---	30 mg/l	45 mg/l	BPJ based on previous permit for facility and previously issued water discharge permits for similar facilities/effluents
TSS	---	---	88 mg/l	Based on the EPA guidelines for TSS limitations for landfills
TOC	---	---	50 mg/l	Multisector General Permit-Sector L and previously issued water discharge permits for similar facilities/effluents
Oil & grease	---	---	15 mg/l	Multisector General Permit-Sector L and previously issued water discharge permits for similar facilities/effluents
Sulfates	---	---	250 mg/l	LAC 33:IX 1113.C.2 and BPJ from previously issued water discharge permits for similar facilities/effluents
Chlorides	---	---	250 mg/l	LAC 33:IX 1113.C.2 and BPJ from previously issued water discharge permits for similar facilities/effluents
Ammonia Nitrogen	---	4.9 mg/l	10 mg/l	EPA's Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category
Alpha Terpineol	---	0.016 mg/l	0.033 mg/l	EPA's Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category

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Effluent Characteristic	Monthly Avg (lbs./day)	Monthly Avg	Daily Max	Basis
Benzoic Acid	---	0.071 mg/l	0.12 mg/l	EPA's Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category
p-Cresol	---	0.014 mg/l	0.025 mg/l	EPA's Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category
Zinc	---	0.11 mg/l	0.2 mg/l	EPA's Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category
Phenol	---	0.015 mg/l	0.026 mg/l	EPA's Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category

\*Monitoring is required on a monthly basis in the permit. EPA Guidelines utilized aeration or other biological treatment (activated sludge, sequencing batch reactor) followed by filtration to establish TSS guidelines. Oxidation ponds like the one utilized by Harold J Babe Landry Landfill are designed to meet secondary limits. Therefore, the Landfill was given the TSS limits monthly average of 27 mg/l and the daily maximum of 88 mg/l.

**Other Effluent Limitations:****1) Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5., the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Daily Maximum) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

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## 2) pH

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C)

## 3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

## 4) Priority Pollutants – General Comments

The treatment facility will be treating leachate, contact stormwater, washwater, and sanitary wastewater. Studies have shown the leachate generated at municipal solid waste landfills can be highly concentrated and variable, and may include the presence of priority pollutants. Contributing to this variability may be the presence of household hazardous waste in the municipal solid waste stream (EPA, 1987). Pollutants which may be found in leachate include volatile organic compounds, metals and pesticides.

This Office has established a list of priority pollutants with threshold limits intended as action levels. Should a substance exceed the level of the established concentration, the Department is to be notified, in writing, within five (5) days of exceedance and St. Landry Parish Landfill shall institute a study to determine the source of the substance. Within sixty (60) days of the written notification the permittee shall submit a written account of the nature of the study, the study results, and measures being taken to secure abatement.

1. **Draft Threshold Limits** – The draft threshold limits are derived from either technology-based effluent limits or State Water Quality Standards and requirements. The most stringent of these limits is contained in the permit. Technology-based effluent limitations are based on the applicable effluent limitations guidelines, on Best Professional Judgement (BPJ) in the absence of applicable guidelines, or on a combination of these two methods. Currently, there are guidelines for the treatment of leachate from a municipal solid waste landfill and they have been included in the permit in addition to these threshold values. This office intends to employ technology-based effluent limitations taken from previously issued BPJ based water discharge permits for municipal solid waste landfills and other land disposal facilities. Each of the guideline regulations were accompanied by a development document, which provided the support for the final guideline. A water quality screen was performed using effluent characteristics since the landfill is the only source of flow to the unnamed tributary to Bayou Boeuf. This screen was used to establish water quality based limits.

2. Derivation of Threshold Limits

**LDEQ/EPA Technology-Based Limits** – In the early 1980's the LDEQ and EPA developed effluent limitations for all of the priority pollutants contained in the EPA 2C application for land disposal facilities. Although the limitations were technology-based and derived prior to formal State water quality criteria, water quality considerations played a significant role in the development of the limits.

**Priority Metals and Pesticides** – The threshold limits established for metals and pesticides are water quality based in accordance with the state water quality criteria (Appendix B-1). Metals for which state criteria have not been promulgated, threshold limits have been established using technology-based effluent limits taken from water discharge permits previously issued to municipal solid waste landfills and other land disposal facilities. In accordance with the water quality standards, there may be no discharge of PCBs

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Chemical	DEQ/EPA Daily Max. ug/l	WQBL Daily Max. ug/l	Threshold Value ug/l	ML Required ug/l
METALS, CYANIDE, AND TOTAL PHENOLS				
Total Antimony	600		600	60
Total Arsenic	100	8074	100	10
Total Beryllium	100		100	5
Total Cadmium	100	728	100	1
Chromium III	100	37432	100	10
Chromium VI	100	115	100	10
Total Copper	500	847	500	10
Total Cyanide	100	251	100	20
Total Lead	150	3364	150	5
Total Mercury	10	5.8	5.8	0.2
Total Nickel (freshwater)	500	55596	500	40
Total Selenium	100		100	5
Total Silver	100		100	2
Total Thallium	100		100	10
Total Zinc	1000	4733	1000	20
Total Phenols	50	7867	50	5
VOLATILE COMPOUNDS				
Acrolein	100		100	50
Acrylonitrile	100		100	50
Benzene	100	9376	100	10
Bromodichloromethane	100	2475	100	10
Bromoform	100	33016	100	10
Carbon Tetrachloride	100	900	100	10
Chlorobenzene	100		100	50
Chloroethane	100		100	10
2-Chloroethyl vinyl ether	100		100	50
Chloroform	100	32565	100	10
Dibromochloromethane	100	3810	100	10
1,1-Dichloroethane	100		100	10
1,2-Dichloroethane	100	5100	100	10
1,1-Dichloroethylene (1,1-Dichloroethene)	100	435	100	10
1,2-Dichloropropane	100		100	10
1,3-Dichloropropene (1,3-Dichloropropylene)	100	6828	100	10
Ethylbenzene	□□□□360	36059	100	10
Methyl Bromide (Bromomethane)	100		100	50
Methyl Chloride (Chloromethane)	100	619767	100	50
Methylene Chloride	100	65259	100	20
1,1,2,2,-Tetra-chloroethane	100	1350	100	10
Tetrachloroethylene	100	1875	100	10
1,2-trans-Dichloroethylene	100		100	10
Toluene	100	14310	100	
1,2-trans-Dichloroethylene (1,2-dichloroethene)	100		100	10

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VOLATILE COMPOUNDS (continued)				
1,1,1-Trichloroethane	100	59497	100	10
1,1,2-Trichloroethane	100	5175	100	10
Trichloroethylene (Trichloroethene)	100	15752	100	10
Vinyl Chloride	100	26854	100	10
ACID COMPOUNDS				
2-Chlorophenol (o-Chlorophenol)	100	2907	100	10
2,4-Dichlorophenol	100	2276	100	10
2,4-Dimethylphenol	100		100	10
2,4-Dinitrophenol	100		100	50
4,6-Dinitro-o-Cresol (4,6-Dinitro-o-phenol) (4,6-Dinitro-2-methyl phenol)	100		100	50
2-Nitrophenol	100		100	20
4-Nitrophenol	100		100	50
P-Chloro-M-Cresol	100		100	
Pentachlorophenol	100		100	50
Phenol	100		100	10
2,4,6-Trichlorophenol	100		100	10
PESTICIDES				
Aldrin	10	0.3	0.3	0.05
Chlordane	10	0.142	0.142	0.2
DDD	10	0.202	0.202	0.1
DDE	10	0.143	0.143	0.1
DDT	10	0.172	0.172	0.1
Dieldrin	10	0.037	0.037	0.1
Endosulfan	10	0.056*	0.056*	0.1
Endosulfan	10	0.056*	0.056*	0.1
Total Endosulfan		0.109	0.109	0.1
Endosulfan sulfate	10		10	0.1
Endrin	5	0.973	0.973	0.1
Endrin aldehyde	10		10	0.1
Heptachlor	10	0.053	0.053	0.05
Heptachlor Epoxide	10		10	0.05
Hexachlorocyclohexane - (BHC-)	10		10	0.05
Hexachlorocyclohexane - (BHC-)	10		10	0.05
Hexachlorocyclohexane - (BHC-)	10	10.72	10	0.05
Hexachlorocyclohexane - (Lindane)	10	10.72	10	0.05
Total PCB's	No discharge			1.0
Toxaphene	10	0.03	0.03	5.0
BASE/NEUTRAL COMPOUNDS				
Acenaphthene	100		100	10
Acenaphthylene	100		100	10
Anthracene	100		100	10
Benzidene	100		100	50
Benzo(a)anthracene	100		100	10



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BASE/NEUTRAL COMPOUNDS (continued)				
3,4-Benzofluoranthene				
{Benzo(b)fluoranthene}	100		100	10
Benzo(k)fluoranthene	100		100	10
Benzo(a)pyrene	100		100	10
Benzo(ghi)perylene	100		100	10
Benzyl butyl Phthalate				
{Butyl benzyl Phthalate}	100		100	10
Bis(2-chloroethyl)ether	100		100	10
Bis(2-chloroethoxy) methane	100		100	10
Bis(2-ethylhexyl) Phthalate	100		100	10
Bis(2-chloroisopropyl) ether	100		100	10
4-Bromophenyl phenyl ether	100		100	10
2-Chloronaphthalene	100		100	10
4-Chlorophenyl phenyl ether	100		100	10
Chrysene	100		100	10
Dibenzo (a,h) anthracene	100		100	20
Di-n-Butyl Phthalate	100		100	10
1,2-Dichlorobenzene	100		100	10
1,3-Dichlorobenzene	100		100	10
1,4-Dichlorobenzene	100		100	10
{p-Dichlorobenzidine}				
3,3-Dichlorobenzidine	100		100	50
Diethyl Phthalate	100		100	10
Dimethyl Phthalate	100		100	10
2,6-Dinitrotoluene	100		100	10
2,4-Dinitrotoluene	100		100	10
Di-n-octyl Phthalate	100		100	10
1,2-Diphenylhydrazine	100		100	20
Fluoranthene	100		100	10
Fluorene	100		100	10
Hexachlorobezene	100	0.187	0.187	10
Hexachlorobutadiene	100	57.5	57.5	10
Hexachlorocyclopentadiene	100		100	10
Hexachloroethane	100		100	20
Ideno (1,2,3-cd)pyrene	100		100	20
Isophorone	100		100	10
Naphthalene	100		100	10
Nitrobenzene	100		100	10
N-nitrosodimethylamine	100		100	50
N-nitrosodiphenylamine	100		100	20
N-nitrosodi-n-propylamine	100		100	20
Phenanthrene	100		100	10
Pyrene	100		100	10
1,2,4-Trichlorobenzene	100		100	10

\* Chronic Value taken from the Water Quality Criteria Summary  
Total Chromium has been removed from State Water Quality Standards and replaced with criteria for Chromium III and Chromium VI, reference to Total Chromium has been removed from the PPS tables.

A number of the threshold limitations established from the criteria are below EPA established minimum quantification levels (MQL). The MQL is accepted as the lowest concentration at which a substance can be quantitatively measured. Where the permit limits are below the MQL the following is noted in the permit:

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If any individual analytical test result is less than the minimum quantification level (MQL) listed above, a value of zero (0) may be used as the test result for those parameters for the Discharge Monitoring Report (DMR) calculations and reporting requirements.

### 5) Toxicity Characteristics

In accordance with EPA's Region 6 Post-Third Round Toxics Strategy, permits issued to treatment works treating domestic wastewater with a flow (design or expected) greater than or equal to 1 MGD shall require biomonitoring at some frequency for the life of the permit or where available data show reasonable potential to cause lethality, the permit shall require a whole effluent toxicity (WET) limit (*Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards*, October 7, 2009, VERSION 7).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No. LA0056227, **Biomonitoring Section** for the organisms indicated below.

#### TOXICITY TESTS

#### FREQUENCY

Acute static renewal 48-hour definitive toxicity test  
using Daphnia pulex

Once/Quarter

Acute static renewal 48-hour definitive toxicity test  
using fathead minnow (Pimephales promelas)

Once/Quarter

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 4%, 5%, 7%, 9%, and 12%. The low-flow effluent concentration (critical low-flow dilution) is defined as 9% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section** of the permit.

The permit may be reopened to require effluent limits, additional testing, and/or other appropriate actions to address toxicity if biomonitoring data show actual or potential ambient toxicity to be the result of the permittee's discharge to the receiving stream or water body. Modification or revocation of the permit is subject to the provisions of LAC 33:IX.2383. Accelerated or intensified toxicity testing may be required in accordance with Section 308 of the Clean Water Act

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**OUTFALL 002**

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Daily Max.	Basis
BOD	---	---	45 mg/l	Previously issued permit and the Class II Sanitary Discharge General Permit (flow is <25,000 GPD)
TSS	---	---	45 mg/l	Previously issued permit and the Class II Sanitary Discharge General Permit (flow is <25,000 GPD)
Fecal Coliform colonies/100mg/l	---	---	400 mg//l	Previously issued permit and the Class II Sanitary Discharge General Permit (flow is <25,000 GPD)
Oil & grease	---	---	15 mg/l	Multisector General Permit- Sector L and previously issued water discharge permits for similar facilities/effluents
Soaps and Detergents	---	Report	---	Condition is based on BPJ, the LPDES Vehicle Washing General Permit and previously issued permit
Visible Sheen	---	---	No Presence	Condition is based on BPJ, the LPDES Vehicle Washing General Permit and previously issued permit

**1) pH**

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C)

**2) Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.

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**OUTFALL 004**

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Daily Max.	Basis
TOC	---	---	50 mg/l	Multisector General Permit-Sector L and previously issued water discharge permits for similar facilities/effluents
Oil & grease	---	---	15 mg/l	Multisector General Permit-Sector L and previously issued water discharge permits for similar facilities/effluents
Total Recoverable Iron	---	---	Report	Multisector General Permit-Sector L and previously issued water discharge permits for similar facilities/effluents
Total Barium	---	---	Report	Multisector General Permit-Sector L and previously issued water discharge permits for similar facilities/effluents

**1) pH**

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C)

**2) Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

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**X. PREVIOUS PERMITS:**

LPDES Permit No. LA0056227: Issued: June 1, 2004  
Expired: May 31, 2009

**Outfall 001**

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Monthly Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	1/day	Estimate
BOD <sub>5</sub>	30 mg/l	45 mg/l	1/ 2 weeks	Grab
TSS	90 mg/l	135 mg/l	1/ 2 weeks	Grab
Ammonia-Nitrogen	4.9 mg/l	10 mg/l	1/ 2 weeks	Grab
Fecal Coliform Colonies	200	400	1/ 2 weeks	Grab
Chlorides	---	250 mg/l	1/ 2 weeks	Grab
Sulfates	---	250 mg/l	1/ 2 weeks	Grab
TOC	---	50 mg/l	1/ 2 weeks	Grab
Oil & Grease	---	15 mg/l	1/ 2 weeks	Grab
pH	---	---	1/ 2 weeks	Grab
Priority Pollutant Scan	---	Report	1/ 6 months	Grab
Alpha Terpineol	0.016 mg/l	0.033 mg/l	1/quarter	Grab
Benzoic Acid	0.071 mg/l	0.12 mg/l	1/quarter	Grab
p-Cresol	0.014 mg/l	0.025 mg/l	1/quarter	Grab
Zinc	0.11 mg/l	0.2 mg/l	1/quarter	Grab
Phenol	0.015 mg/l	0.026 mg/l	1/quarter	Grab

**Outfall 002**

BOD <sub>5</sub>	---	45 mg/l	1/month	Grab
TSS	---	135 mg/l	1/month	Grab
Oil & Grease	---	15 mg/l	1/month	Grab
Fecal Coliform Colonies	---	400	1/month	Grab
Soaps and detergents	---	Report	1/month	Grab
Visible Sheen	---	No presence	1/month	Grab
pH	---	---	1/month	Grab

**Outfall 004**

TOC	---	50 mg/l	1/month	Grab
Oil & Grease	---	15 mg/l	1/month	Grab
Total Recoverable Iron	---	Report	1/quarter	Grab
Total Barium	---	Report	1/quarter	Grab
pH	---	---	1/month	Grab

The permit contains biomonitoring.

**XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:****A) Inspections**

A review of the files indicates that no inspections have been performed at the facility in the past two years

**B) Compliance and/or Administrative Orders**

A review of the files indicates that no compliance orders have been issued against the facility in the past two years

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**C) DMR Review**

A review of the discharge monitoring reports for the period beginning **June 2007** through **June 2009** has revealed no violations.

**XII. ADDITIONAL INFORMATION:**

The Louisiana Department of Environmental Quality (LDEQ) reserves the right modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

This permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(C) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act or more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's, if the effluent standard, limitations, water quality studies or TMDL's so issued or approved:

- a) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- b) Controls any pollutant not limited in the permit; or
- c) Requires reassessment due to change in 303(d) status of waterbody; or
- d) Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

Please be aware that the Department has the authority to reduce monitoring frequencies when a permittee demonstrates two or more consecutive years of compliance. Monitoring frequencies established in LPDES permits are based on a number of factors, including but not limited to, the size of the discharge, the type of wastewater being discharged, the specific operations at the facility, past compliance history, similar facilities and best professional judgment of the reviewer. We encourage and invite each permittee to institute positive measures to ensure continued compliance with the LPDES permit, thereby qualifying for reduced monitoring frequencies upon permit reissuance. If the Department can be of any assistance in this area, please do not hesitate to contact us. As a reminder, the Department will also consider an increase in monitoring frequency upon permit reissuance when the permittee demonstrates continued non-compliance.

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for sanitary landfill facilities

**SEWAGE SLUDGE**

Part II, Section D requires that any truck disposing of hauled sewage sludge into the landfill must be properly registered by the Louisiana Department of Environmental Quality (LDEQ) to haul sewage sludge. The receipt of hauled sewage sludge from an unauthorized/unregistered hauler shall constitute a violation of the permit.

## Statement of Basis

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**Stormwater Pollution Prevention Plan**

If the permittee does not already have a Storm Water Pollution Prevention Plan (SWP3), then the permittee shall prepare, implement, and maintain a SWP3 within six (6) months of the effective date of the final permit. The terms and conditions of the SWP3 shall be an enforceable Part of the permit. Any runoff leaving the developed areas of the facility, other than the permitted outfall(s), exceeding 50 mg/L TOC, 15 mg/L Oil and Grease, or having a pH less than 6.0 or greater than 9.0 standard units shall be a violation of this permit. Any discharge in excess of these limitations, which is attributable to offsite contamination, shall not be considered a violation of this permit. A visual inspection of the facility shall be conducted and a report made annually as described in Part II, Section B of the permit.

If the permittee does already have a Storm Water Pollution Prevention Plan, the Plan should be reviewed for compliance with Part II, Section B of the permit and updated if necessary.

**XIII. TENTATIVE DETERMINATION:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

**XIV. REFERENCES:**

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, St. Mary Parish Government, Harold J Babe Landry Landfill, November 30, 2008